

# **EXHIBIT D**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

- - -

ALISON O'DONNELL,

Plaintiff,  
vs.

Case No. 1:16-cv-2450  
Judge Donald E. Nugent

UNIVERSITY HOSPITALS  
HEALTH SYSTEM, et al.,

Defendants.

- - -

DEPOSITION OF SUMANA NARASIMHAN, M.D.  
Tuesday, August 29, 2017

- - -

The deposition of SUMANA NARASIMHAN, M.D.,  
a Defendant herein, called for examination by  
the Plaintiff under the Federal Rules of Civil  
Procedure, taken before me, Diane M. Stevenson,  
a Registered Diplomate Reporter, Certified  
Realtime Reporter, and Notary Public in and for  
the state of Ohio, pursuant to notice, at  
Vorys, Sater, Seymour & Pease LLP, 200 Public  
Square, Suite 1400, Cleveland, Ohio, commencing  
at 6:45 p.m., the day and date above set forth.

Stevenson Reporting Service, Inc.  
2197 Macon Court Westlake, Ohio 44145  
440.892.8600 diane@nls.net

1           there.

2                   It is not just, "Oh, you just get extra  
3           time," for example.

4   Q.       Did you agree that Dr. Matthews needed more  
5           time in the program in order to complete it?

6   A.       I did feel that would be helpful.

7   Q.       Then are the Wednesday -- are you familiar with  
8           the Wednesday conferences?

9   A.       Yes.

10   Q.       Are those important to the program?

11   A.       They are essential to the program.

12   Q.       How so? Why, in your view, are they essential  
13           to the program?

14   A.       Because the Wednesday conferences allow for a  
15           free exchange of ideas, also the presentation  
16           of cases that the service is seeing that whole  
17           week, plus any interesting case that could be  
18           discussed.

19                   There is also time to discuss a certain  
20           topic. There is also journal review in that  
21           time that can be scheduled where we review the  
22           literature on the latest article on something,  
23           or whatever, and do an in-depth review.

24                   The Wednesday conferences are also a time  
25           when we invited outside doctors to come in,

1 outside our specialties, sometimes visiting  
2 people, to come and talk to us.

3 We would sometimes have psychiatry come in  
4 and talk to us, psychology/psychiatry talk to  
5 us about, say, diabetes, do like a joint  
6 conference.

7 It was really the part of the week which  
8 allowed for us to get away from a routine, see  
9 the patient, write the note, give the  
10 assessment to "How is everybody thinking?"

11 And if somebody went to a national  
12 conference, they would come back and give the  
13 gist of what they learned in that conference.  
14 And that was the expectation.

15 It allowed us to practice our  
16 presentations. Like if I was going to a  
17 national meeting and I had a poster, I would  
18 bring the poster to the Wednesday conference.  
19 If I had an oral, I would actually practice  
20 with somebody timing and everybody writing  
21 their comments and getting that feedback from a  
22 friendly audience before you went to a national  
23 audience.

24 So it was really useful for both faculty  
25 and fellows.